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10 PROTON MANAGEMENT LTD.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

15 ELECTRIC SOLIDUS, INC. d/b/a
16 SWAN BITCOIN, a Delaware
corporation,

17 Plaintiff,

V.

19 PROTON MANAGEMENT LTD., a
British Virgin Islands corporation;
20 THOMAS PATRICK FURLONG;
ILIOS CORP., a California corporation;
MICHAEL ALEXANDER HOLMES;
RAFAEL DIAS MONTELEONE;
SANTHIRAN NAIDOO; ENRIQUE
ROMUALDEZ; and LUCAS
VASONCELOS.
21
22
23

Defendants.

Case No. 2:24-cv-8280-MWC-E

**DECLARATION OF ADAM TRIGG
IN SUPPORT OF APPLICATION
FOR LEAVE TO FILE UNDER
SEAL DEFENDANT PROTON
MANAGEMENT LTD.'S MOTION
TO COMPEL ARBITRATION**

Date: June 13, 2025

Time: 9:00 a.m.

Place: Courtroom 6A, 6th Fl.

Judge: Hon. M. Williams Court

Am. Compl. Filed: Jan. 27, 2025

DECLARATION OF ADAM C. TRIGG

I, Adam C. Trigg, declare as follows:

3 1. I am a Partner with the law firm Bergeson LLP. I represent Defendant
4 Proton Management Ltd. (“Proton”) in this matter. I submit this Declaration in
5 connection with the Application for Leave to File Under Seal Exhibits to the
6 Declaration of Adam C. Trigg in Support of Its Opposition to Swan’s ex parte
7 application for Temporary Restraining Order (“Opposition”). Unless stated
8 otherwise, this Declaration is based on my personal knowledge.

9 2. Proton seeks to redact narrow portions of its Memorandum of Points
10 and Authorities and the Declaration of San Naidoo in Support of Proton's
11 Opposition, which include confidential and proprietary information related to
12 Proton's assets and operations.

13 3. Compelling reasons exists to seal portions of the *Ex Parte* Application
14 and Corresponding Exhibits. Here, Proton seeks limited redaction of highly
15 confidential information regarding Proton's assets and operations.

16 4. Proton would suffer harm if its confidential and proprietary information
17 relating to its business assets were disclosed to the public.

18 5. Proton has narrowly tailored its sealing so as to only redact what is
19 necessary. Furthermore, the public does not have a countervailing interest in this
20 information.

21 6. I declare under penalty of perjury under the laws of the United States of
22 America that to the best of my understanding the foregoing is true and correct.

24 | Dated: June 12, 2025

By: /s/ Adam C. Trigg
Adam C. Trigg